

3.600 St. Louis Co.
General

EXHIBIT
1

February 16, 1979

Mr. John Nixon
Plant Manager
Certain-Teed Products Comp.
600 St. Cyr Road
St. Louis, MO 63137

Dear Mr. Nixon:

This is to follow-up on our recent site inspection and subsequent discussion of the open asbestos dump situated on company property bordering Moline Creek. As a result of these acturties we have confirmed the following:

1. Current company processes utilize a recycling system to reclaim waste water and solids, thereby eliminating any continued land disposal of the asbestos-laden waste material as previously practiced at the site.
2. The company is in the process of formulating plans to stabilize the dump, so as to minimize adverse environmental impact and comply with the provisions of the MO Solid Waste Management Law, Rules and Regulations. The alternatives under consideration include:
a) Hauling the waste material off site to an approved disposal area, or b) covering the dump in accordance with Departmental guidelines.

We recommend that the company select one of these alternatives and proceed to develop appropriate plans for accomplishing the same, as soon as possible. We ask that you advise this office when the alternative has been selected, and that your consulting engineer submit the plans to our Central Office, Solid Waste Management Program, for necessary review and approval before proceeding to haul or cover the material.

We appreciate your cooperation in this matter. Should further clarification be needed, please advise.

Sincerely,

Mike Duvall

Mike Duvall
Environmental Specialist II
Regional Administrator
St. Louis Regional Office

07KF



4.2

0400

MD/lb

CC: Central Office, Solid Waste Management Program

MISSOURI DEPARTMENT OF NATURAL RESOURCES
8460 Watson Road St. Louis, Missouri 63119 (314) 849-1313

Joseph P. Teasdale Governor
Fred A. Lafser Director
St. Louis Regional Office

RECEIVED FEB 27 1979

Application for a Department of the Army Permit

CERTAINTEED CORP.
CLAUDE PLAN
ASBESTOS CEMENT
WASTE PILE
600 ST CYR RD
ST. LOUIS MO

Section 14

The plan, as it was being developed and prior to construction, was submitted to Mo. DNR, local representative, which was to act for EPA Region VII to process and issue permits as required by EPA.

For installation of on-site pipe sewers which clearly is a responsibility of the Metropolitan St. Louis Sewer District and methods of bank stabilization which in other portions of the metropolitan St. Louis area is a responsibility of MSD, approval was obtained from MSD. Because of the contractual relationship that exists for Maline Creek between the St. Louis District Corps of Engineers and the MSD, Reitz & Jens, Inc. assumed that permission from MSD included permission as required from the Corps.

The rock armor on the channel has a total length approaching 800 feet with slightly more than half of it, but still less than 500 feet, on the GAF property. For the limitation that a permit is not needed for bank stabilization if length did not exceed 500 feet, clearly neither Certainteed nor GAF by itself would have required a permit.

However, another criterion, if the amount of material per lineal foot of bank stabilization exceeded one yard, requires a permit.

Further, no new bank cut was needed for the sewers; therefore, no federal permit would be required. Also, our understanding was that on interior portions of watersheds the Corps has delegated to MSD or to St. Louis County, issuance of such permits. The Maline Creek Channel involved was realigned over 50 years ago.

This work did not create fastland within the floodplain adjoining Maline Creek.

Neither is there any wetland involved.

No polluting material is being placed in the floodplain; in fact, the whole purpose of this work was to remove a possible source of pollution.

Reviewing Section 404, Public Law 92-500 with interpretations, that a permit would be required when the "normal flow" is 5 cfs or greater and the local interpretation put upon size of watershed developing at least 5 cfs "normal flow", a permit is required.

Therefore, this application after the fact for Corps permit has been prepared.

EXHIBIT
#2

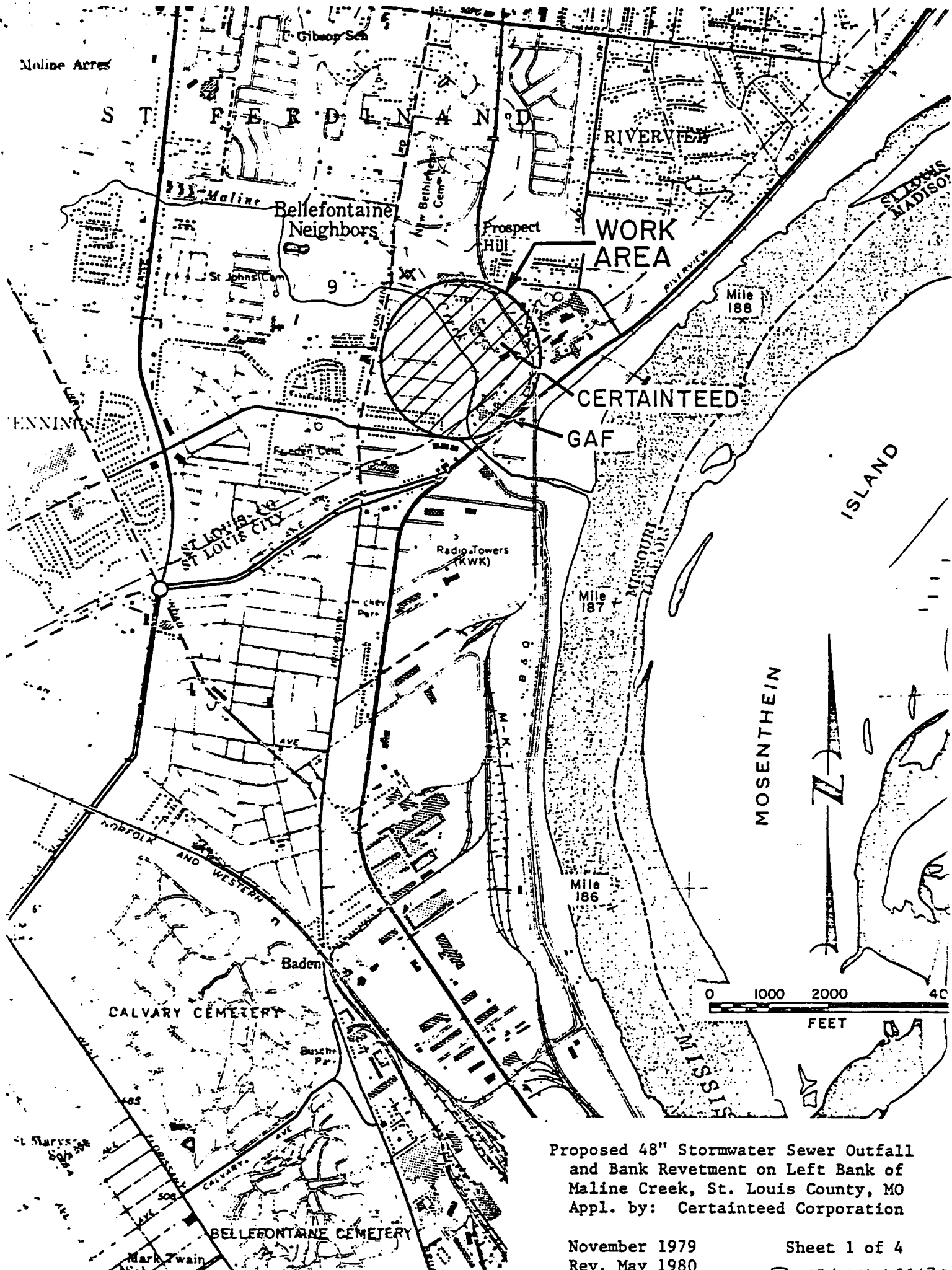
Application for a Department of the Army Permit

Section 6

Waste material from asbestos cement manufacturing has been accumulated on the north bank of Maline Creek. Two different corporations, GAF downstream and Certainteed Products upstream, successors to Ruberoid and Keasbey-Mattison Companies, respectively, own the properties on which the spoil pile which straddles their common property line appears as a single stockpile. The Environmental Protection Agency cited GAF for this exposed material containing asbestos and required that the potential for erosion by surface runoffs into Maline Creek and the Mississippi River be removed.

The waste pile was secured by flattening its perimeter slopes, covering its surface with earth to support plant growth, building pipe sewers and inlets to carry off surface waters, and placing a rock armor coat on the bank of the Maline Creek to prevent bank erosion.

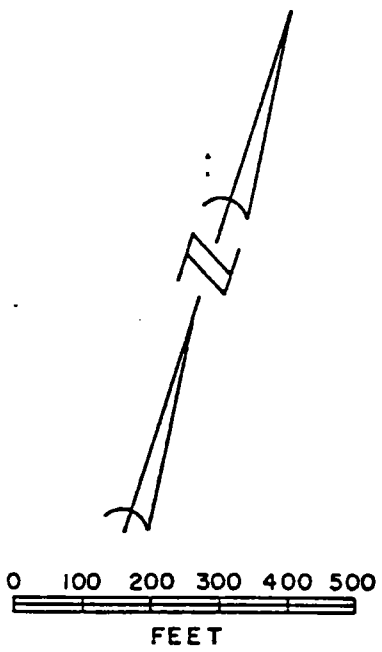
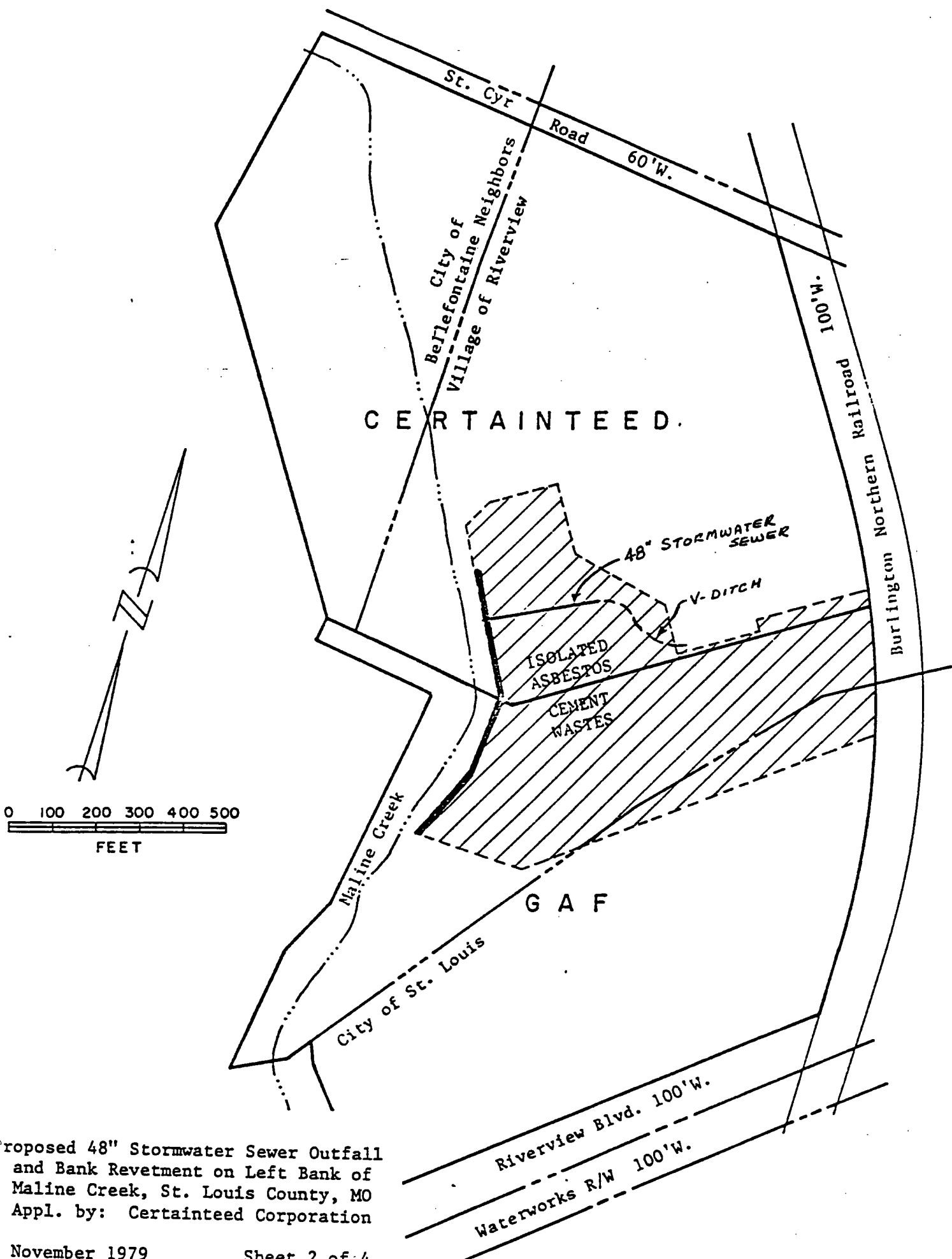
The Metropolitan St. Louis Sewer District, with its broad powers and responsibilities in water management, reviewed and issued a permit for the pipe sewer construction and the bank protection of Maline Creek. The St. Louis Regional Office of the Mo. DNR, acting for the EPA Region VII office in Kansas City, approved the details of the grading, cover and seeding of the area in which the waste had been accumulated (see copies of correspondence). Also attached are two exhibits, one shows this location within the metropolitan St. Louis area and the other, a larger scale print shows the details of the work done on-site.



Proposed 48" Stormwater Sewer Outfall
and Bank Revetment on Left Bank of
Maline Creek, St. Louis County, MO
Appl. by: Certainteed Corporation

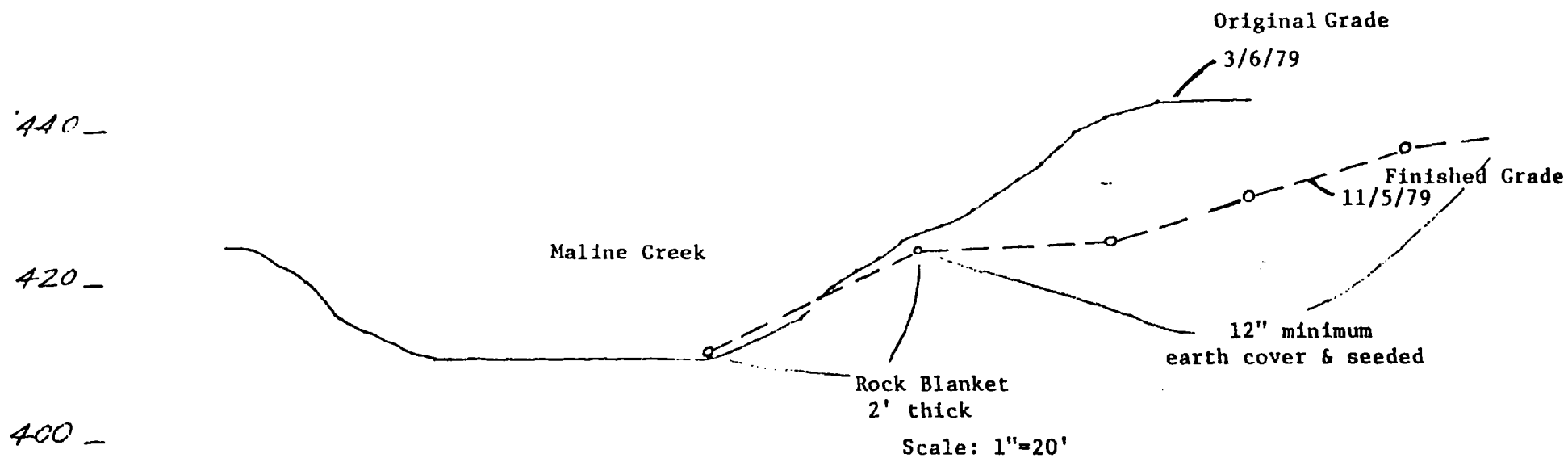
November 1979
Rev. May 1980

Sheet 1 of 4



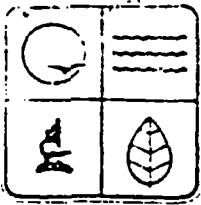
Proposed 48" Stormwater Sewer Outfall
and Bank Revetment on Left Bank of
Maline Creek, St. Louis County, MO
Appl. by: Certainteed Corporation

PROFILE ALONG GAF-CERTAINTED PROPERTY LINE
(Looking upstream)



APPLICATION FOR PERMIT
Reitz & Jens, Inc.
November 1979

Fig. 2B



3.600 St. Louis Co.
GAF - Certainteed Corp.
Asbestos Dump

EXHIBIT

4

August 24, 1979

Mr. Murray Sherman
GAF Corp.
9215 Riverview Drive
St. Louis, MO 63137

Mr. John Nixon
Certainteed Products Corp.
600 St. Cyr Road
St. Louis, MO 63137

Gentlemen:

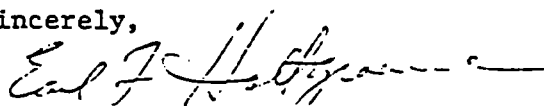
This is to advise that staff of the Missouri Department of Natural Resources-Solid Waste Management Program and St. Louis Regional Office, have completed review of the plans and specifications for final closure of the asbestos waste disposal piles at the GAF Corporation and Certainteed Products Corporation plant sites, St. Louis, Missouri, as prepared by Reitz & Jens, Inc. We are in agreement with the said closure plans as a means of stabilizing the waste piles from the continued release of water and air-borne asbestos fiber contaminants from the sites.

Approval is hereby given these plans with the following conditions:

1. That the project consultant final inspect the work upon completion to insure basic conformance with the grading, covering and seeding provisions, and installation of the rip-rap and drainage appurtenances as specified.
2. That the project consultant inspect the site on at least one additional occasion after vegetative growth has been firmly established to insure the integrity of all erosion control measures.

The cooperation demonstrated by both GAF and Certainteed toward resolving the matter has been appreciated by this office.

Sincerely,


Earl F. Holtgraewe, P.E.
Regional Administrator
St. Louis Regional Office
Department Of Natural Resources

Joseph P. Teasdale Governor
Fred A. Lafser Director
St. Louis Regional Office

EFH/MD/1b

Central Office, Water Pollution Control Program
CC: David Murray, Reitz & Jens Inc.
Metropolitan St. Louis Sewer District
Environmental Protection Agency, Region VII

MISSOURI DEPARTMENT OF NATURAL RESOURCES
8460 Watson Road St. Louis, Missouri 63119 (314) 849-1313

August 16, 1979

Mr. Earl Holtgraewe, P.E., Reg. Adm.
St. Louis Regional Office
Department of Natural Resources
8460 Watson Rd.
St. Louis, MO 63119

RE: Certainteed & GAF Asbestos Waste Piles Closure

Dear Mr. Holtgraewe:

This is to follow up on our phone conversation of August 15 and to give you our impressions of the plan for final closure of the subject waste disposal area as submitted to this office and reportedly your office by Reitz and Jens, Inc. It was understood that your office will be responsible for giving final approval of the plan if it meets with your satisfaction and, in conjunction, we are to provide you with any comments we might have.

We are in agreement with the closure plan as presented by Reitz & Jens, Inc. and suggest that upon completion of the closure operation the site receive surveillance to insure that the cover soil and riprap are properly in place and that a good perennial vegetative cover is established over the area. The main concern is to insure that both water and wind erosion are minimized. Upon completion of the project, it is suggested the area be inspected until a permanent vegetative cover is established and the integrity of all erosion control measures is insured.

If your review of the proposal for closure is favorable, please send us a copy of the approval letter. We understand that the contractor expects to start work on the project August 27, 1979. When the contractor has finished work, a closure plat should be filed with the appropriate Recorder(s) of Deeds as indicated by the consultant.

If you have any questions concerning our comments, please call.

Sincerely,

Thomas B. Ellis

Thomas B. Ellis
Environmental Engineer
Solid Waste Management Program

TBE:d1

cc: Mr. David E. Murray, Reitz & Jens, Inc.

RECEIVED 000 3 1979

REITZ & JENS, INC.
CONSULTING ENGINEERS

HENRY M. REITZ, PRESIDENT
STIFEL W. JENS, SENIOR VICE PRESIDENT
JOHN J. BAILEY, JR., VICE PRES., CHIEF ENG.
DAVID E. MURRAY, VICE PRESIDENT
DONALD S. ESKRIDGE, SECRETARY

111 SOUTH MERAMEC AVENUE
St. Louis, Missouri 63105

(314) 727-0403

SOIL MECHANICS-FOUNDATIONS
HYDROLOGY-HYDRAULICS
RESOURCE RECLAMATION
DRAINAGE-PAVEMENTS
LAND DEVELOPMENT
WATER RESOURCES
SOLID WASTE

August 10, 1979

Mr. Robert M. Robinson, Director
Solid Waste Management Program
Mo. DNR
Box 1368
Jefferson City, MO 65102

Re: Request for Final Closure
GAF-Certainteed Waste Piles

Dear Mr. Robinson:

This is a followup of our discussion of August 1, 1979 concerning proposed final closure plans for the asbestos waste disposal on the GAF Corporation property at 9215 Riverview Dr., St. Louis, Mo. and the Certainteed Corporation property at 600 St. Cyr Rd., St. Louis, Mo.

Construction bids have been received by both companies but contracts have not yet been awarded. Plans were filed yesterday with St. Louis Metropolitan Sewer District to obtain permit approval for surface water discharge into Moline Creek.

It is expected that contracts will be awarded and the contractor should be able to start work by August 27, 1979.

Proposed grading plan shows suggested final grades for the two waste piles. The contractor has the flexibility to adjust the slope within the range of 3H:1V maximum slope around the perimeter of the pile and to a minimum of 2% slope over the top surface of the pile. After the material is reworked, the asbestos waste will be covered with a minimum of 12 inches of dirt overburden removed from the Portland Cement Co. shale pit nearby. After the 12 inches cover is applied, the surface will be seeded. The plans also show a rock blanket placed on all slopes disturbed on the creek (MSD jurisdiction).

Attached, for your review and file, are two copies each of: 1) proposed Grading Plan; 2) seeding specification; 3) copy of Missouri-Portland Cement Co. letter authorizing removal of overburden; 4) draft of documents showing waste pile location to be filed with Recorder of Deeds when final closure is made.

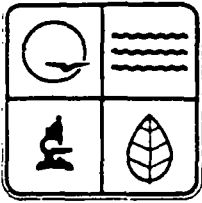
If you have any questions, please advise.

Very truly yours,


DAVID E. MURRAY

Encl.
DEM/rs
cc: GAF Corp.
Certainteed Corp.

RECEIVED AUG 13 1979



3.600 St. Louis County
GAF-Certainteed Company Asbestos Dump

June 2, 1980

EXHIBIT

#5

Mr. John P. McGinley
Vice President, Manufacturing
A-C Pipe Division
Certainteed Corporation
P.O. Box 860
Valley Forge, PA 19482

Dear Mr. McGinley:

This is to advise that we have completed our staff review of the project to stabilize the asbestos waste pile located at the Certainteed Corporation plant site in St. Louis County, Missouri.

The results of our latest inspection of the site conducted on May 13, 1980 confirm that the project has been completed in basic conformance with the approved plans and specifications as prepared by the consultant, Reitz & Jens, Inc. The inspector was satisfied that the necessary work has been accomplished in terms of the specified grading, covering and vegetative growth establishment provisions, as well as installation of the stream bank rip-rap and storm water drainage appurtenances. Verification of the closure plat to be filed with the County Recorder of Deeds Office has also been received in this office.

Based upon these determinations, it is our judgement that the Certainteed Corporation has taken the necessary actions to stabilize the asbestos waste pile and thereby restore the site to a condition in which it no longer poses a threat of contamination to the water or air resources of the state.

We again thank Certainteed Corporation personnel for their cooperation in resolving this matter in good order.

Sincerely,

Earl F. Holtgraewe, P.E.
Regional Administrator
St. Louis Regional Office
Department of Natural Resources

EFH/MD/dak

CC: Reitz & Jens, Inc.
Environmental Protection Agency, Region VII
Metropolitan St. Louis Sewer District
Central Office, Solid Waste Management Program

Joseph P. Teasdale Governor
Fred A. Lafser Director
St. Louis Regional Office

RECEIVED JUN 5 1980

MISSOURI DEPARTMENT OF NATURAL RESOURCES
8460 Watson Road St. Louis, Missouri 63119 (314) 849-1313

REITZ & JENS, INC.

CONSULTING ENGINEERS

111 SOUTH MERAMEC AVENUE

ST. LOUIS, MISSOURI 63105

(314) 727-0403

HENRY M. REITZ, PRESIDENT
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SOIL MECHANICS-FOUNDATIONS
HYDROLOGY-HYDRAULICS
RESOURCE RECLAMATION
DRAINAGE-PAVEMENTS
LAND DEVELOPMENT
WATER RESOURCES
SOLID WASTE

May 5, 1980

Mr. Earl Holtgraewe, Regional Administrator
St. Louis Regional Office
Mo. DNR
8460 Watson Rd.
St. Louis, MO 63119

Re: CertainTeed Waste Pile Closure

Dear Mr. Holtgraewe:

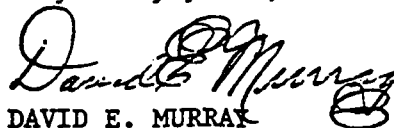
The asbestos cement waste pile closure has been completed at the CertainTeed Corp. plant site in accordance with the closure plans submitted to the Mo. DNR last August.

Two recent site visits were made in April to verify that a permanent vegetative growth was well established. The fence along the property line between CertainTeed Corp. and GAF Corp. has not yet been installed.

Enclosed for your review is a copy of the Closure Plat showing location of the secured waste pile. This Closure Plat will be filed with the Recorder of Deeds' office.

We request your final inspection and approval of this project. If there are any questions, please call.

Very truly yours,


DAVID E. MURRAY

Encl.
DEM/rs
cc: CertainTeed Corp. ✓

RECEIVED MAY 9 1980

EXHIBIT

#6

CertainTeed Corporation
A-C Pipe Plant
St. Louis, MO

Contract Specifications for Closure
of Asbestos-Cement Waste Pile
Specification No. STL-79-1

A. Scope of Project

The contractor shall provide all the labor, equipment, material, supplies and services necessary to complete the proper closure of the asbestos-cement waste piles on the CertainTeed Corporation property at 600 St. Cyr Road, St. Louis, Missouri.

When completed, the work should conform to the drawing entitled "Proposed Grading Plan" which was prepared by Reitz & Jens, Inc. and approved by the Missouri Department of Natural Resources.

In general, the work shall include, but not necessarily be limited to, the following:

- (1) Clear, remove and dispose of trees and other vegetation in the work area. May be disposed of off-site or on-site if placed in middle of reworked waste pile. Some of the large trees around the perimeter of the site may remain at the contractor's option if they will not hinder his operation on the project. Trees may be sawed off within 18 inches of ground level provided the tree stump surface will be at least two feet below final grade.
- (2) Construct rock blanket along Maline Creek. (See plan for details).
- (3) Remove existing waste accumulation outside limits of proposed re-shaped pile and place on pile (see plans for details). Rework

perimeter slopes to no steeper than 3H:1V (see plans for suggested slope details). Move excess material from this grading onto waste pile. Reshape top of pile to drain. Slopes on top of pile shall be no flatter than 2%. Round tops of perimeter slopes to blend with top of pile (see plan for details). Grade drainage swales on sides of reshaped pile (see plan for details).

- (4) Construct drainage structure for discharge into Maline Creek (see plan for details). This will be staked out by the engineer for the owner.
- (5) Load and truck in clean earth cover and spread over entire surface of waste pile and regraded yard area. Cover material may be excavated by the contractor at the Missouri Portland Cement Company shale pit north of the site at no cost for borrow.

Earth cover on perimeter slopes, top of reshaped pile and drainage swales shall not be less than 12 inches thick. Earth cover on regraded yard area shall not be less than 12 inches thick.
- (6) Prepare surface for seeding.
- (7) Seed, fertilize, mulch top of pile, perimeter slopes and drainage swales.

Reitz & Jens, Inc. will act as representatives for CertainTeed and will provide the contractor with detailed specifications and drawings required to complete the work.

B. Permits

The contractor shall supply all necessary construction permits and licenses which may be required by local governmental authorities.

C. Safety & Health

- (1) It shall be the contractor's responsibility to properly inform his employees of the hazards associated with working with asbestos and to take all other necessary safety precautions as directed by current OSHA regulations.

All handling and disposal of asbestos-cement waste will be in accordance with current EPA regulations and in accordance with the conditions of the State Permit issued by the Missouri Department of Natural Resources for disposal in the state. If the contractor has any doubt as to what is required to properly indoctrinate his employees on the subject of working with asbestos, he should contact CertainTeed for assistance.

- (2) The contractor shall provide his employees with throw-away protective clothing and approved dust masks on a daily basis. CertainTeed will reimburse the contractor for the direct cost associated with this special protective equipment.
- (3) CertainTeed Corporation will contract with an independent company to conduct an industrial hygiene air monitoring program throughout the length of this project. The results of the dust sampling will be made available to the contractor.

D. Payment

All the work necessary to complete the project shall be performed for the lump sum fixed price of \$399,770.00.

Progress payment will be made monthly provided the contractor submits his invoice, properly substantiated, to Reitz & Jens, Inc. for their

review and approval. They, in turn, will forward the approved invoice to CertainTeed Corporation, P. O. Box 860, Valley Forge, PA 19482, attention of J. P. McGinley.

Within 10 days after receiving an approved invoice, CertainTeed shall pay the contractor ninety percent (90%) of the value of the completed work. When one half ($1/2$) of the total project is completed, CertainTeed shall pay the contractor ninety-five percent (95%) of the value of the completed work.

The total of all payments required prior to the final progress payment shall not exceed ninety-five percent (95%) of the total contract amount.

The contractor shall develop and submit to CertainTeed a project schedule showing major milestone events so that comparisons can be made when approving progress payments.

When the project is complete, the contractor shall furnish CertainTeed with a complete release from all liens arising out of this contract or receipts in full covering all labor, materials, and equipment for which a lien could be filed, or a bond satisfactory to the owner indemnifying him against any lien. The final invoice from the contractor shall state that the project work has been completed in full and conforms with the project specifications and drawings supplied by Reitz & Jens, Inc. CertainTeed will pay the contractor the balance of the monies owed thirty (30) days after receiving the final requisition provided that the contractor complies with the conditions stated above.

E. Insurance

During the course of construction and until the work is finally accepted by CertainTeed, or until sooner authorized by CertainTeed in writing, contractor shall maintain the following kinds of insurance with minimum limits as set forth below:

Kind of Insurance	Minimum Limits
(a) Worker's Compensation	Statutory
(b) Employer's Liability	\$100,000 each accident-disease
(c) Contractor's Comprehensive General Liability (including Contractural Liability and, if subcontractors are employed, Contractor's Protective Liability)	Bodily Injury: \$250,000 each person \$500,000 each occurrence Property Damage: \$500,000 each occurrence
(d) Automobile Bodily Injury Liability (including hired automobiles and non ownership liability)	\$250,000 each person \$500,000 each accident
(e) Automobile Property Damage Liability (including hired automobiles and non ownership liability)	\$100,000 each accident

Contractor agrees that it and all of its subcontractors will comply with all applicable Worker's Compensation laws and that it will from time to time on the request of CertainTeed furnish evidence to CertainTeed that all payments required by such laws have been and are being made.

J. P. McGinley

October 10, 1979

CERTAINTEED



EXHIBIT
#7

Remedial Work



REITZ & JENS, INC.

CONSULTING ENGINEERS

111 SOUTH MERAMEC AVENUE

St. Louis, Missouri 63105

11-5-79